

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIDGESTONE AMERICAS TIRE
OPERATIONS, LLC,

LEAR SIEGLER DIVERSIFIED
HOLDINGS CORP., and

FERODO AMERICA, LLC,

Defendants.

Civil Action No. 1:22-cv-1647

NOTICE OF LODGING

Plaintiff, the United States of America, by the authority of the Attorney General, through its undersigned attorneys, and at the request of the Administrator of the United States Environmental Protection Agency (“EPA”), hereby lodges the attached proposed Consent Decrees in the above-captioned action. If approved by the Court after a public comment period, the Consent Decrees would resolve the United States’ claims under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9607, for recovery of unreimbursed costs that EPA incurred for response activities associated with the New Castle Asbestos Site in New Castle, Indiana.

Notice of this lodging of these Consent Decrees will be published in the Federal Register to solicit public comment in accordance with Department of Justice policy. During the pendency of the 30-day public comment period, no action is required of this Court. After the expiration of the public comment period and evaluation of the comments received, the United States will

advise the Court as to whether the Consent Decrees may be entered or whether further action may be required.

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice

Dated August 19, 2022



PEDRO SEGURA
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Environmental Enforcement Section
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CERTIFICATE OF SERVICE

In accordance with Paragraph 36 of the Consent Decree signed by Lear Siegler Diversified Holdings Corp., I certify that on this date I caused copies of the foregoing Notice of Lodging (and the accompanying proposed Consent Decree signed by Lear Siegler Diversified Holdings Corp.) to be served on the following individual by electronic mail:

For Lear Siegler Diversified Holdings Corp.:

James F. Matthews
Former President, Lear Siegler Diversified Holdings Corp.
1402 Bellezza Lane
Naples, FL, 34110
LSDHC1997@gmail.com

In accordance with Paragraph 39 of the Consent Decree signed by Bridgestone Americas Tire Operations, LLC and Ferodo America, LLC, I certify that on this date I caused copies of the foregoing Notice of Lodging (and the accompanying proposed Consent Decree signed by Bridgestone Americas Tire Operations, LLC and Ferodo America, LLC) to be served on the following individuals by mail and electronic mail:

For Ferodo America, LLC:

Mary Ellen Hogan
Associate General Counsel, Environmental Health Safety & Security
Tenneco
7450 N. McCormick Blvd.
Skokie, IL, 60076
MHogan@driv.com

For Bridgestone Americas Tire Operations, LLC:

David Dumas
Associate General Counsel, Legal Recoveries and Environmental Litigation
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200 4th Avenue South
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Dated: August 19, 2022



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